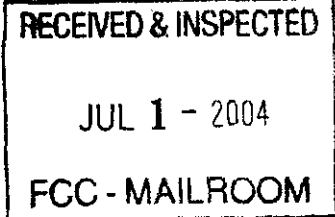


**Sandhill
Communications, LLC**

P.O. Box 519
Jefferson, S.C. 29718



June 25, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544


Re: In the Matter of The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Sandhill Communication's submits this letter and accompanying certification as record that Sandhill Communication's is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003.

As Sandhill Communication's is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, Sandhill Communication's is not subject to such requirements at this time. If Sandhill Communication's operations are altered to the extent that Sandhill Communication's necessarily becomes a Completing Carrier, Sandhill Communication's will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,


Irvin B. Williams
President
Sandhill Communications

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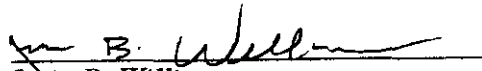
¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF SANDHILL COMMUNICATIONS, LLC**

1. My name is Irvin B. Williams. I currently serve as the President of Sandhill Communications, a provider of interstate interexchange telecommunications services as a toll reseller in the state of South Carolina. In this capacity, I have become familiar with the network operations of Sandhill Communications and its practices associated with the completion of calls originated from Pay Telephones.
2. Sandhill Communications is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless access code calls, Sandhill Communications is a switchless reseller. Sandhill Communications contracts with Farmers Long Distance for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, Sandhill Communications is a switchless reseller. Sandhill Communications contracts with Spirit Telecom for completion of subscriber toll-free calls.
5. Sandhill Communications does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. Sandhill Communications does not create call detail records for either access code calls or subscriber toll-free payphone calls. Sandhill Communications action with respect to call detail records is limited to rating and billing.
7. Sandhill Communications compensates Spirit Telecom and Farmers Long Distance for the wholesale cost of the call.
8. Sandhill Communications has confirmed with Spirit Telecom and Farmers Long Distance that any calls purchased by Sandhill Communications are included in the respective call tracking systems and compensation remittance process of Spirit Telecom and Farmers Long Distance.
9. In consideration of the aforementioned facts, Sandhill Communications is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).

I certify under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct. Executed on June 25, 2004.


Irvin B. Williams
President
~~Sandhill~~ Communications, LLC
P.O. Box 519
Jefferson, S.C. 29718